

## Schary, Claire

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**From:** Marti.Bridges@deq.idaho.gov  
**Sent:** Tuesday, November 25, 2014 2:45 PM  
**To:** Schary, Claire  
**Cc:** Michael.Mcintyre@deq.idaho.gov; Barry.Burnell@deq.idaho.gov  
**Subject:** Idaho Trading Guidance concepts  
**Attachments:** Guidance\_Water Quality Pollutant Trading\_ConceptDraft\_112414.doc; Guidance\_Water Quality Pollutant Trading\_ConceptDraft\_112414\_clean.doc

**Importance:** High

Claire, Michael and Barry: This is the work that Bobby Cochran and Tim Martin from Willamette Partnership have been helping me flesh out. This “refresh” or concept draft as we’ve called it here, is intended to be our cut at a draft pilot that would inform and update Idaho’s existing Guidance to test drive before doing an actual final public comment draft in a year or even two, depending upon when the Lower Boise TMDL gets submitted to EPA for approval. This document has had the two Trading Frameworks removed for the time being because a) I have no plans currently to do anything with the Mid Snake/Upper Snake Rock, and b), we are hoping USGS will and Alex Etheridge will agree to contract with Willamette Partnership and Alex will help answer some key questions, model updated ratios for us and some other matters that are pertinent to the Lower Boise. We’ll know more on if USGS can deliver in a timely manner what we need for that important piece.

In the meantime, there are unsanitized comments between me, Bobby and Tim on issues we haven’t quite resolved yet. Some of these are more related to DEQ, one in particular with regard to the use of SRF funds for trading, and others are with regard to Claire’s memory on the old “water quality contribution” discussion of the original Lower Boise Framework. Since we don’t have “no net increase” language in our WQS now and rely solely upon our anti-degradation guidance, and also because the expectation is that there in fact is a net water quality benefit that goes above and beyond a 1:1 ratio, and ratios will help ensure that in fact occurs, I’m looking for a better way to characterize that conceptually. We aren’t gearing up for multiple offsets vis a vis anti-deg, like City of Boise’s proposed Dixie Drain project. We’ve made less emphasis on the difference between offsets and trading, since offsets have some specific meaning now in our own WQS relative to anti-deg. And the way most offsets have been used in Idaho is by a permittee who has some inherent control over the site they are offsetting, whereas a trade is when someone else develops as part of their operations to reduce their non point obligations and then sells the credits above and beyond it for trading purposes. Another issue for Claire and possibly Susan Poulosom to discuss is how we articulate the filing of trade reports, the timing of a monthly trade reconciliation and other thoughts. This is the time to update that language so it’s more readable. My goal is for the relevant parts to be in here from the prior Guidance with more meat, and any elements that relate that should be brought into Guidance that were part of the Boise Trading Framework, too.

Anyways, I would like all of you to “dive in” head first in the next week or so and provide some comments/feedback. I’m also happy to schedule in a call once folks have had some time to digest this. I’m sending you the draft with comments and the cleaned up version.

Claire, Bobby will likely contact you, too, about some of this.

Once we get this pinned down a bit better, I’ll be concentrating more on Lower Boise Framework attributes to update similarly as we obtain some various work products for that.

Have a great Thanksgiving.

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